

The Honorable John H. Chun
United States District Court Judge

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

Bianey GARCIA PEREZ, Maria
MARTINEZ CASTRO, J.M.Z.,
Alexander MARTINEZ HERNANDEZ,
on behalf of themselves as individuals
and on behalf of others similarly
situated,

Plaintiffs,

v.

U.S. CITIZENSHIP AND
IMMIGRATION SERVICES; Ur
JADDOU, Director, U.S. Citizenship
and Immigration Services; EXECUTIVE
OFFICE FOR IMMIGRATION
REVIEW; Mary CHENG, Director
(Acting), Executive Office for
Immigration Review,

Defendants.

Case No. 2:22-cv-00806-JHC

**JOINT STATUS REPORT &
STIPULATION AND ORDER**

Note on Calendar: April 22, 2024

PARTIES' JOINT STATUS REPORT AND STIPULATION

Plaintiffs Bianey Garcia Perez; Maria Martinez Castro; J.M.Z.; Alexander Martinez Hernandez; and Defendants U.S. Citizenship and Immigration Services ("USCIS"); Ur Jaddou, Director, USCIS; Executive Office for Immigration Review ("EOIR"); and Mary Cheng, Director (Acting), EOIR, submit this status report.

The parties' counsel have agreed to the terms of the settlement agreement.

The Department of Justice must complete its settlement review process and approve the settlement. *See* 28 C.F.R. § 0.160(a) (authorizing Assistant Attorneys General to approve settlements with respect to matters assigned to their respective divisions); *id.* § 0.160(d) (requiring that any proposed settlement, regardless of amount or circumstances, be referred to the Deputy Attorney General or the Associate Attorney General, if it meets any one of specified criteria); Civil Division Directive No. 1-15 – 28 C.F.R. Part 0 (available at <https://www.justice.gov/jm/civil-resource-manual-46-redelegation-authority-compromise-civil-claims>). Undersigned counsel for Defendants estimates that the Department of Justice's process will take no more than thirty-six days, barring unforeseen circumstances.

Plaintiffs and Defendants have previously jointly stipulated to several stays. *See* ECF Nos. 34, 37, 39, 41, 44, 46, 48, 51, 53, 56, 58, 60, 62. Most recently, the parties jointly stipulated to a stay on February 23, 2024. ECF No. 61. On March 5, 2024, this Court granted the parties' stay and ordered the parties to submit a joint status report on April 22, 2024. ECF No. 62.

In light of these developments, the parties have agreed to stipulate to a thirty-six-day stay of Defendants' briefing deadlines. Good cause continues to exist for an extension of time, because the complexity of the issues in this case and the proximity of settlement. If this Court grants an extension, the parties would move for preliminary approval of a settlement agreement or seek a further extension, if necessary, by May 28, 2024.

STIPULATION - 2
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IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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/s/ Aaron Korthuis

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Dated this 20th day of April, 2024.

STIPULATION - 3
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 2nd day of May.



The Honorable John H. Chun
UNITED STATES DISTRICT JUDGE